STATEMENT OF BASIS (AI No. 1000)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0107387 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Ashland Inc.
Ashland Distribution Company
11109 South Choctaw Avenue
Baton Rouge, Louisiana 70805

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: *Davina Simms*

DATE PREPARED: September 27, 2005

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - effective date: November 1, 2000
expiration date: October 31, 2005

C. LWDPS permit - (WP4400) effective date: January 31, 1994
expiration date: January 30, 1999

D. Date Application Received: May 5, 2005. Additional information was received on August 15, and October 3 and 4, 2005.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - chemical storage and distribution facility

This is an existing facility that stores chemicals and solvents in bulk in storage tanks, bags, containers, drums, etc. The facility receives chemicals/solvents in rail cars, tank trucks, and in pre-packaged containers. Chemicals/solvents are pumped to bulk tanks from the trucks or railcars at the truck unloading station or the rail unloading station.

The chemicals/solvents are blended and packaged to meet customer demands. The chemicals/solvents can either be pumped to the blend tanks from bulk tanks, from trucks, or on rare occasions from a drum. If the blending is to occur in the trucks, chemicals/solvents are pumped from the bulk tanks to the truck at the truck rack. Shipment is made in containers with a capacity of 549 gallons or less, or via tank wagons/transports.

The bulk storage tanks are exposed to stormwater and are in secondary containment areas. Materials stored in bags, containers, drums, etc. are kept in a warehouse and are not exposed to stormwater. All unloading/loading and blending activities occur under cover. See Appendix A for a list of products handled at the facility.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: II; as per LAC33:IX.1319 Table I and SIC 5161. In Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the *Standard Industrial Classification Manual*, the SIC code 5169 is equivalent to a previous SIC code of 5161.
3. Wastewater Type: II
4. SIC code: 5169

C. LOCATION - 11109 South Choctaw Avenue in Baton Rouge, East Baton Rouge Parish Latitude 30°28'20", Longitude 91°03'49"

3. OUTFALL INFORMATION

Outfall 001 (*)

Discharge Type: stormwater runoff from the entire facility

This outfall has been deleted.

Outfall 002 (*)

Discharge Type: stormwater from Tank Farm A
Treatment: none
Location: at the point of discharge from Tank Farm A (Latitude 30°28'24", Longitude 91°03'49")
Flow: intermittent
Discharge Route: to an open ditch via Outfall 001, thence into an unnamed tributary, thence into the Comite River

Outfall 003 (*)

Discharge Type: stormwater from Tank Farm B
Treatment: none
Location: at the point of discharge from Tank Farm B (Latitude 30°28'24", Longitude 91°03'49")
Flow: intermittent
Discharge Route: to an open ditch via Outfall 001, thence into an unnamed tributary, thence into the Comite River

Outfall 004 (*)

Discharge Type: stormwater from Tank Farm D
Treatment: none
Location: at the point of discharge from Tank Farm D (Latitude 30°28'24", Longitude 91°03'49")
Flow: intermittent
Discharge Route: to an open ditch via Outfall 001, thence into an unnamed tributary, thence into the Comite River

Outfalls 005 and 006

Discharge Type: stormwater from Tank Farms C (005) and E (006)

Outfalls 005 and 006 were included in WP4400. The outfalls were not included in the previous LPDES permit because Tank Farms C and E were taken out of service. The stormwater that accumulates in these areas was included in Outfall 007 in the previous permit.

Outfall 007 (*)

Discharge Type: stormwater from the northeast corner of the facility which includes abandoned Tank Farms C and E, the truck parking area, and the drummed acid and caustic storage area.

This outfall has been deleted.

(*) In accordance with LAC 33:IX.2511.A.1, discharges composed of storm water "...shall not be required to obtain an LPDES permit except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14, facilities classified as SIC code 5169 are not considered to have stormwater discharges associated with industrial activity.

However, in accordance with LAC 33:IX.2511.A.1.e and LAC 33:IX.2511.A.9.a.iv, any stormwater discharges which "contribute to a violation of water quality standards or is a significant contributor of pollutants to waters of the state", shall be required to obtain an LPDES permit.

Because Tank Farms A, B and D are exposed to stormwater, there is a potential for stormwater contamination in these areas. Therefore, Outfalls 002, 003, and 004 shall remain in the permit.

Outfall 007 was included in the previous permit and is listed in the application to discharge stormwater runoff from the northeast corner of the facility which includes abandoned Tank Farms C and E, the truck parking area, and the drummed acid and caustic storage area. Because there is low potential for contamination of stormwater runoff from the northeast corner of the facility, Outfall 007 has been deleted.

Outfall 001 discharges stormwater from the entire facility. All loading/unloading, handling, and storing, except for in Tank Farms A, B and D, is conducted under roof. Stormwater that accumulates in the secondary containment for Tank Farms A, B and D will be monitored at Outfalls 002, 003 and 004 respectively. For all areas, other than Tank Farms A, B, and D, that discharge to Outfall 001, there is low potential for contamination of stormwater. Because stormwater from Tank Farms A, B, and D are monitored prior to discharging to Outfall 001, Outfall 001 has been deleted.

Although the potential for contamination is low for the areas outside of Tank Farms A, B and D, the areas shall be included in the Stormwater Pollution Prevention Plan due to the toxic nature of the chemicals handled at the facility.

4. RECEIVING WATERS

STREAM – to an open ditch, thence into an unnamed tributary, thence into the Comite River

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040103

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. fish and wildlife propagation

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale on page 8.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

1. An inspection conducted on January 31, 2001 revealed the following: the permit and DMRs were on site and appeared to be in order; there were no apparent violations; and the receiving water had no smell, oily sheen, or solids present.

B. DMR Review/Excursions: DMRs were reviewed for 2003 through the present. The following excursions were reported:

Date	Parameter	Outfall	Reported Value	Permit Limits
04/05	TOC	003	203 mg/L	50 mg/L
	COD	003	211 mg/L	100 mg/L
03/05	TOC	004	250 mg/L	50 mg/L
	COD	004	651 mg/L	100 mg/L
02/05	COD	003	116 mg/L	100 mg/L
	TOC	004	75 mg/L	50 mg/L
	COD	004	169 mg/L	100 mg/L
01/05	TOC	004	314 mg/L	50 mg/L
	COD	004	1310 mg/L	100 mg/L
	Oil and Grease	007	16 mg/L	15 mg/L
11/04	TOC	001	63 mg/L	50 mg/L
	Oil and Grease	001	25 mg/L	15 mg/L
	COD	001	232 mg/L	100 mg/L
10/04	TOC	004	55 mg/L	50 mg/L
	COD	004	175 mg/L	100 mg/L
04/04	TOC	004	102 mg/L	50 mg/L
	COD	004	659 mg/L	100 mg/L
03/04	TOC	003	337 mg/L	50 mg/L
	COD	003	1380 mg/L	100 mg/L
	TOC	004	119 mg/L	50 mg/L
	COD	004	255 mg/L	100 mg/L

DMR Excursions cont.

Date	Parameter	Outfall	Reported Value	Permit Limits
02/04	COD	001	131 mg/L	100 mg/L
	COD	002	176 mg/L	100 mg/L
	TOC	004	649 mg/L	50 mg/L
	COD	004	1990 mg/L	100 mg/L
01/04	TOC	003	771 mg/L	50 mg/L
	COD	003	2620 mg/L	100 mg/L
	TOC	004	1990 mg/L	50 mg/L
	COD	004	6090 mg/L	100 mg/L
12/03	COD	003	121 mg/L	100 mg/L
	TOC	004	445 mg/L	50 mg/L
	COD	004	1250 mg/L	100 mg/L
02/03	TOC	001	103 mg/L	50 mg/L
	COD	001	309 mg/L	100 mg/L
	TOC	004	451 mg/L	50 mg/L
	COD	004	1470 mg/L	100 mg/L
01/03	TOC	004	518 mg/L	50 mg/L
	COD	004	1810 mg/L	100 mg/L

7. 303(d) LISTED WATERBODIES

The discharges from Ashland Distribution Company are to the Comite River via an unnamed tributary, Subsegment 040103 of the Lake Pontchartrain Basin. Subsegment 040103, Comite River – entrance of White Bayou to Amite River, is listed on LDEQ's Final 2004 303(d) List as impaired for pathogen indicators. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the stormwater runoff from bulk storage facilities have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Ashland Distribution Company is not expected to discharge pollutants associated with the pathogen indicators impairment.

8. EXISTING EFFLUENT LIMITS

Outfalls 001, 002, 003, 004 and 007 – stormwater runoff from the southeast corner of the facility (001); from the secondary containment tank around Tank A (002); from the secondary containment tank around Tank B (003); from the secondary containment tank around Tank D (004); and from parking lots, roofs, and their surrounding areas (007)

Effluent Parameter	Monthly Average	Daily Maximum	Measurement Frequency
Flow - GPD	Report	Report	1/month
COD	----	100 mg/L	1/month
TOC	----	50 mg/L	1/month
Oil and Grease	----	15 mg/L	1/month
pH Minimum/Maximum (Standard Units)	----	6.0 - 9.0	1/month

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040103 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested

persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Ashland Inc.

1. **Outfalls 002, 003 and 004** - stormwater from Tank Farms A (002), B (003), and D (004)

Pollutant	Limitation Mo. Avg:Daily Max (mg/l)	Reference
Flow	Report:Report	*;previous permit
COD (*1)	---:100 mg/L	*;previous permit
TOC	---:50 mg/L	*; previous permit
Oil and Grease	---:15 mg/L	*; previous permit
Total BTEX (*2)	---:250 ug/L	BPJ
Total Phenols (*3)	---:500 ug/L	BPJ
Total Cyanide (*4)	---:100 ugL	BPJ
pH	6.0 - 9.0 su	*; previous permit
METALS		
Antimony (*4)	---:600 ug/L	BPJ
Arsenic (*4)	---:100 ug/L	BPJ
Beryllium (*4)	---:100 ug/L	BPJ
Cadmium (*4)	---:100 ug/L	BPJ
Chromium (*4)	---:150 ug/L	BPJ
Copper (*4)	---:500 ug/L	BPJ
Lead (*2,*4)	---:150 ug/L	BPJ
Mercury (*4)	---:10 ug/L	BPJ
Nickel (*4)	---:500 ug/L	BPJ
Selenium (*4)	---:100 ug/L	BPJ
Silver(*4)	---:100 ug/L	BPJ
Thallium(*4)	---:100 ug/L	BPJ
Zinc (*4)	---:1000 ug/L	BPJ
VOLATILE COMPOUNDS		
Acrolein (*4)	---:100 ug/L	BPJ
Acrylonitrile (*4)	---:100 ug/L	BPJ
Benzene (*2,*4)	---:100 ug/L	BPJ
Bromoform (*4)	---:100 ug/L	BPJ
Carbon Tetrachloride(*4)	---:100 ug/L	BPJ
Chlorobenzene (*4)	---:100 ug/L	BPJ
Chlorodibromomethane (*4)	---:100 ug/L	BPJ
Chloroethane (*4)	---:100 ug/L	BPJ
2-Chloroethyl Vinyl Ether (*4)	---:100 ug/L	BPJ
Chloroform (*4)	---:100 ug/L	BPJ
Dichlorobromomethane (*4)	---:100 ug/L	BPJ
1,1-Dichloroethane (*4)	---:100 ug/L	BPJ
1,2-Dichloroethane (*4)	---:100 ug/L	BPJ
1,1-Dichloroethylene (*4)	---:100 ug/L	BPJ
1,2-Dichloropropane (*4)	---:100 ug/L	BPJ
1,3-Dichloropropylene (*4)	---:100 ug/L	BPJ
Ethylbenzene (*4)	---:100 ug/L	BPJ

Methyl Bromide (*4)	---:100 ug/L	BPJ
Methyl Chloride (*4)	---:100 ug/L	BPJ
Methylene Chloride (*4)	---:100 ug/L	BPJ
1,1,2,2-Tetra-Chloroethane (*4)	---:100 ug/L	BPJ
Tetrachloroethylene (*4)	---:100 ug/L	BPJ
Toluene (*4)	---:100 ug/L	BPJ
1-2-Trans-Dichloroethylene (*4)	---:100 ug/L	BPJ
1,1,1-Trichloroethane (*4)	---:100 ug/L	BPJ
1,1,2-Trichloroethane (*4)	---:100 ug/L	BPJ
Trichlorethylene (*4)	---:100 ug/L	BPJ
Vinyl Chloride (*4)	---:100 ug/L	BPJ

ACID COMPOUNDS

Phenol (*4)	---:100 ug/L	BPJ
2-Nitrophenol(*4)	---:100 ug/L	BPJ
4-Nitrophenol(*4)	---:100 ug/L	BPJ
2,4-Dinitrophenol(*4)	---:100 ug/L	BPJ
4,6-Dinitro-O-Cresol(*4)	---:100 ug/L	BPJ
P-Chloro-M-Cresol(*4)	---:100 ug/L	BPJ
Pentachlorophenol(*4)	---:100 ug/L	BPJ
2-Chlorophenol (*4)	---:100 ug/L	BPJ
2,4-Dichlorophenol (*4)	---:100 ug/L	BPJ
2,4,6-Trichlorophenol (*4)	---:100 ug/L	BPJ
2,4-Dimethylphenol (*4)	---:100 ug/L	BPJ

BASE/NEUTRAL COMPOUNDS

1,2-Dichlorobenzene(*4)	---:100 ug/L	BPJ
1,2-Diphenylhydrazine(*4)	---:100 ug/L	BPJ
1,2,4-Trichlorobenzene(*4)	---:100 ug/L	BPJ
1,3-Dichlorobenzene(*4)	---:100 ug/L	BPJ
1,4-Dichlorobenzene(*4)	---:100 ug/L	BPJ
2-Chloronaphthalene(*4)	---:100 ug/L	BPJ
2,4-Dinitrotoluene(*4)	---:100 ug/L	BPJ
2,6-Dinitrotoluene(*4)	---:100 ug/L	BPJ
3,3-Dichlorobenzidine(*4)	---:100 ug/L	BPJ
3,4-Benzofluoranthene(*4)	---:100 ug/L	BPJ
4-Bromophenyl Phenyl Ether(*4)	---:100 ug/L	BPJ
4-Chlorophenyl Phenyl Ether(*4)	---:100 ug/L	BPJ
Acenaphthene(*4)	---:100 ug/L	BPJ
Acenaphthylene(*4)	---:100 ug/L	BPJ
Anthracene(*4)	---:100 ug/L	BPJ
Benzidine(*4)	---:100 ug/L	BPJ
Benzo (a) Anthracene(*4)	---:100 ug/L	BPJ
Benzo (a) Pyrene(*4)	---:100 ug/L	BPJ
Benzo, (g,h,i) Perylene(*4)	---:100 ug/L	BPJ
Benzo (k) Fluoranthene(*4)	---:100 ug/L	BPJ
Bis (2-Chloroethoxy) Methane(*4)	---:100 ug/L	BPJ
Bis (2-Chloroethyl) Ether(*4)	---:100 ug/L	BPJ
Bis (2-Chloroisopropyl) Ether(*4)	---:100 ug/L	BPJ
Bis (2-Ethylhexyl) Phthalate(*4)	---:100 ug/L	BPJ

Butyl Benzyl Phthalate(*4)	---:100 ug/L	BPJ
Chrysene(*4)	---:100 ug/L	BPJ
Dibenzo (a,h) Anthracene(*4)	---:100 ug/L	BPJ
Diethyl Phthalate(*4)	---:100 ug/L	BPJ
Dimethyl Phthalate(*4)	---:100 ug/L	BPJ
Di-N-Butyl Phthalate(*4)	---:100 ug/L	BPJ
Di-N-Octyl Phthalate(*4)	---:100 ug/L	BPJ
Fluoranthene(*4)	---:100 ug/L	BPJ
Fluorene(*4)	---:100 ug/L	BPJ
Hexachlorobenzene(*4)	---:100 ug/L	BPJ
Hexachlorobutadiene(*4)	---:100 ug/L	BPJ
Hexachlorocyclopentadiene(*4)	---:100 ug/L	BPJ
Hexachloroethane(*4)	---:100 ug/L	BPJ
Ideno (1,2,3-c,d) Pyrene(*4)	---:100 ug/L	BPJ
Isophorone(*4)	---:100 ug/L	BPJ
Naphthalene(*4)	---:100 ug/L	BPJ
Nitrobenzene(*4)	---:100 ug/L	BPJ
N-Nitrosodimethylamine(*4)	---:100 ug/L	BPJ
N-Nitrosodi-n-propylamine(*4)	---:100 ug/L	BPJ
N-Nitrosodiphenylamine(*4)	---:100 ug/L	BPJ
Phenanthrene(*4)	---:100 ug/L	BPJ
Pyrene(*4)	---:100 ug/L	BPJ

PESTICIDES/HERBICIDES

Alpha-Endosulfan(*4)	---:10 ug/L	BPJ
Beta-Endosulfan(*4)	---:10 ug/L	BPJ
Endosulfan Sulfate(*4)	---:10 ug/L	BPJ
Aldrin(*4)	---:10 ug/L	BPJ
Alpha-BHC(*4)	---:10 ug/L	BPJ
Beta-BHC(*4)	---:10 ug/L	BPJ
Gamma-BHC(*4)	---:10 ug/L	BPJ
Delta-BHC(*4)	---:10 ug/L	BPJ
Dieldrin(*4)	---:10 ug/L	BPJ
4,4'-DDE(*4)	---:10 ug/L	BPJ
4,4'-DDD(*4)	---:10 ug/L	BPJ
4,4'-DDT(*4)	---:10 ug/L	BPJ
Heptachlor(*4)	---:10 ug/L	BPJ
Endrin Aldehydye(*4)	---:10 ug/L	BPJ
Heptachlor Epoxide(*4)	---:10 ug/L	BPJ
Chlordane(*4)	---:10 ug/L	BPJ
Toxaphene(*4)	---:10 ug/L	BPJ
PCB-1242(*4)	(*5)	BPJ
PCB-1254(*4)	(*5)	BPJ
PCB-1221(*4)	(*5)	BPJ
PCB-1232(*4)	(*5)	BPJ
PCB-1248(*4)	(*5)	BPJ
PCB-1260(*4)	(*5)	BPJ
PCB-1016(*4)	(*5)	BPJ
2,3,7,8-TCDD (Dioxin)(*4)	---:5 ug/L	BPJ
Endrin(*4)	---:5 ug/L	BPJ

BPJ Best Professional Judgement
su Standard Units
* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

(*1) COD shall only be required for Outfalls 003 and 004.

(*2) This parameter shall be monitored if the outfall could potentially be affected by the handling and/or storage of commodities containing liquid or gaseous hydrocarbons.

(*3) This parameter shall be monitored if the outfall could potentially be affected by the handling and/or storage of commodities containing any phenolic compound.

(*4) This parameter shall be monitored if the outfall could potentially be affected by the handling and/or storage of commodities containing this parameter

(*5) There shall be no discharge of polychlorinated biphenyls (PCBs).

Treatment: none

Monitoring Frequency: flow, COD, TOC, oil and grease, and pH shall be monitored monthly.

All other parameters must be monitored once during each month in which the outfall could potentially be affected by handling and/or storing commodities containing one or more of the specified chemicals, and once a month for two months thereafter (i.e., if a commodity containing one or more of the specified chemicals is handled and/or stored within the tank farm, the specified parameter must be monitored at the outfall for the respective tank farm once during each month in which the specified chemical is handled and/or stored within that tank farm, and monitoring shall continue once per month for two months after the commodity is no longer handled and/or stored within that tank farm). If the effluent limitation is exceeded during either of these two additional months, then monitoring shall continue once per month until the limit is met for two consecutive months at which time monitoring for the specified parameter shall cease.

Limits Justification: flow, TOC, oil and grease, and pH limits are based on the previous permit and on LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6). Monitoring for COD is not typically required for stormwater runoff. However, due to the excessive exceedances at Outfalls 003 and 004, COD will remain in the permit for those outfalls based on BPJ.

The Total Phenols parameter is included in the permit based on BPJ because the facility may handle and/or store commodities that contain phenolic compounds, and there is potential for leaks and spills during the transfer of the products. The effluent limit is based on current LDEQ practices.

All other parameters are included in the permit based on BPJ because of the potential for the facility to handle and/or store commodities containing metals, volatile compounds, acid compounds, base/neutral compounds and pesticides/herbicides, and because there is potential for leaks and spills during the transfer of the products. The effluent limitations are based on state empirical limitations and are consistent with current LDEQ practices for permitting stormwater with potential to discharge these types of pollutants.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos" and 40 CFR 442.1.b, "This part is not applicable to... wastewaters resulting from cleaning the interiors of drums, intermediate bulk containers, or closed top hoppers." This facility does not clean tanks used to transport cargo.

NOTE
For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2511.B.14.k, stormwater discharges from facilities classified as SIC Code 5169 are not considered to be associated with industrial activities. However, a SWP3 is included in the permit since there is a potential for stormwater contamination from processes including loading and unloading chemicals.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II, Paragraph N of the Draft Permit)

Appendix A

Ashland Inc., Ashland Distribution Company
LA0107387, AI No. 1000

Product List

ACETONE
BENZYL ALCOHOL
ETHYLENE GLYCOL
FINA FAS 150
GLYCOL ETHER
GLYCOL ETHER DPM
GLYCOL ETHER EB
GLYCOL ETHER PM
HEPTANE
HI-SOL 10
HI-SOL 15
ISOBUTANOL
ISOPROPANOL
KWIK-DRI
LACOLENE
METHANOL
METHYL ETHYL KETONE
MIBK
MINERAL SPIRITS, NON EXEMPT
MINERAL SPIRITS, REGULAR
N-PROPANOL
TOLUENE
TRIETHYLENE GLYCOL
VISTA LPA 210 SOLVENT
VM&P NAPHTHA HI INITIAL 6
XYLENE